

# CITY OF PHILADELPHIA - OFFICE OF IMMIGRANT AFFAIRS

## LANGUAGE ACCESS PLAN & PROTOCOL

Updated 2017

### 1. PURPOSE AND AUTHORITY

- A. In Cooperation with the Mayor's Office, the **Office of Immigrant Affairs** is committed to compliance with Title VI of the Civil Rights Act of 1964, 2 C.S. § 561 et seq. (Act 172 of 2006), and the Philadelphia Home Rule Charter § 8-600 and § A-200, in ensuring meaningful access to City services and programs for individuals with limited English Proficiency ("LEP").
- B. The purpose of this document is to establish an effective plan and protocol for the **Office of Immigrant Affairs** personnel to follow when providing services to, or interacting with, individuals who have limited English proficiency (LEP). Following this plan and protocol is essential to the success of our mission to promote the well-being of immigrant communities by recommending and developing policies and programs to provide opportunity and access to services; to facilitate the successful integration of immigrants into the civic, economic and cultural life of the city; and to highlight the contributions and the essential role that immigrants have played and continue to play in the City of Philadelphia.

### 2. GENERAL POLICY

- A. The Office of Immigrant Affairs recognizes that the population eligible for services includes individuals who are Limited English Proficient (LEP). It is the policy of the Office of Immigrant Affairs to ensure meaningful access to LEP individuals. The Office of Immigrant Affairs adopts the following policy to ensure that LEP individuals can gain equal access to the Office of Immigrant Affairs' services and communicate effectively. This Plan applies to all Office of Immigrant Affairs offices.
- B. It is the City's policy to grant access to services or programs to every person even when the person has a limited ability to speak, understand, read or write English. The Office of Immigrant Affairs intends to take reasonable steps to provide LEP persons with meaningful access to services and programs. The Office of Immigrant Affairs seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their primary language.
- C. **Responsibility-** The Office of Immigrant Affairs bears the following responsibilities:
  - (1) The Office of Immigrant Affairs, rather than the LEP customer, bears the responsibility for providing language appropriate services.
  - (2) Staff at the initial point of contact have the specific duty to identify and record language needs.
  - (3) Use of informal interpreters such as family, friends of the person seeking services, or other customers must be discouraged.
  - (4) Minor children are prohibited from acting as interpreters.
  - (5) No staff may suggest or require that an LEP customer provide an interpreter to receive services.
- C. **Preferred Method of Service:** The preferred method of serving LEP persons is by:
  - (1) Using competent bilingual staff able to provide services directly to the customer in his/her primary language without the need for an interpreter.

- (2) Staff should seek assistance from professional in-person or telephonic interpreters when staff cannot meet language needs.
- (3) Departments should recognize that certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available (for example, situations concerning HIPAA, confidentiality or anything that may have a legal implication). Staff must be authorized to provide language services to communicate effectively even when such assistance is not requested by the LEP person.

### **3. LANGUAGE ACCESS COORDINATOR OR COMMITTEE**

**Language Access Coordinator**

Orlando Almonte

Language Access Program Manager

City of Philadelphia Office of Immigrant Affairs

1401 John F. Kennedy Blvd., 14<sup>th</sup> Floor, Suite 1430, Philadelphia, PA

Direct: (215) 686-2170

[Orlando.almonte@phila.gov](mailto:Orlando.almonte@phila.gov)

**Director:**

Miriam Enriquez, Esq.

Office of Immigrant Affairs

### **4. DIRECT CONTACT WITH LEP INDIVIDUALS**

The Office of Immigrant Affairs has several points of contact with the public:

- a. **Office Walk-ins** – Occasionally, LEP individuals visit the Office of Immigrant Affairs looking for help in obtaining services. In these instances, if there is no bilingual staff available to interpret, staff will use telephonic interpretation. Instructions on how to request telephonic interpretation will be made available to staff.
- b. **Meetings/Information Sessions** – at times OIA will hold meetings or information sessions. If language needs are anticipated, OIA will utilize in-person interpretation for the appropriate language. Instructions on how to request services for meetings ahead of time will be available to staff.
- c. **Events** – OIA hosts several events throughout the year. If language needs are anticipated, OIA will utilize in-person interpretation for the appropriate language. OIA will include taglines and other information for requesting interpretation services ahead of time.

### **5. LANGUAGE ACCESS SERVICES AND PROTOCOLS**

#### **A. INTERPRETATION**

**1.) Services Provided**

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, our department will continue to provide an interpreter, at no cost, for LEP individuals. Services offered include telephonic interpretation and in-person interpretation.

**2.) Protocols**

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, our department will continue to provide an interpreter, at no cost to the resident, for LEP persons pursuant to the following procedures:

- (1) If an individual approaches an employee and appears to be asking for help but has difficulty communicating what he or she needs, and/or
- (2) When a request for an interpreter is made either orally, in writing or by pointing to a language card, the employee shall determine whether bi-lingual staff in the office is available who speaks the language being requested.

### 3.) Procedure

- (1) When bilingual staff is not available, the employee shall contact a telephone interpreter service to provide interpreter services, the process to do so outlined below:

#### Telephonic Interpretation –

OIA can get an over-the-phone interpreter by calling the following vendor: GLOBO. This service is available 24/7.

For a telephonic interpreter:

Dial [REDACTED]

Enter PIN [REDACTED]

Follow prompts for language or press 0 for an operator

- a. Additionally, employees will be given materials that are easy to access that outline the instructions for using telephonic interpretation services on demand (such as stickers for desk phones)
- (2) When an LEP person requests in-person interpretation for a future meeting, telephonic or in-person interpretation may be used, the process for requesting an in-person interpretation is below:

#### In-Person Interpretation –

You can request an in-person interpreter by contacting the following vendor(s): Nationalities Service Center or GLOBO. Requests can be submitted 24/7, but please give more than 48 hours' notice whenever possible. In an emergency, use a telephonic interpreter.

Nationalities Service Center:

- To submit a request online, visit [www.nscphila.org/language-access-services/request-services](http://www.nscphila.org/language-access-services/request-services)
- Fill out service request form and be sure to select interpretation (not translation)
- Enter any interpretation appointment information available
  - You will receive an email once an interpreter has been confirmed

#### Cancelation of In- Person Interpreter

If a request in-person interpreter will not be needed, call Nationalities Service Center to cancel the request at least a full business day in advance of the scheduled time (if possible.)

GLOBO:

- Sign into GLOBO at [phila.globohq.com](http://phila.globohq.com)
- Click on "On-Site Interpreting" on the menu on the left
- Click "New On-Site Appointment"
- Fill out and submit the request form
  - You will receive an email confirming receipt of the request, and then a following email once the interpreter has been confirmed

### 4.) Future Plans/Language Access Goals

- a. **Use telephonic interpretation, and ensure that the public knows about the availability of these services.** The Office of Immigrant Affairs makes telephonic interpretation services available in its main office. The telephonic interpretation service is available in over 100 languages. The office will continue to inform the public about these resources through social media, visible multilingual signs and will train all staff on using telephonic interpretation services.
- b. **Grow in-person interpretation services.** The Office of Immigrant Affairs can offer in-person interpretation for scheduled meetings and events as needed if given enough notice. OIA will continue to inform the public about these resources through social media, visible multilingual signs and will train all staff on requesting in-person interpretation services.

## B. TRANSLATION

### 1.) Services Provided

To ensure that the inability to communicate in English does not deprive the public of rights and privileges, our department will continue to provide translations, at no cost, for LEP individuals. This includes translations of vital documents, signage and portions of our website.

### 2.) Protocol for Document Translation

- a. Vital Documents – Vital written documents include, but are not limited to: consent and complaint forms; written notices of rights; notices of public meetings; and notices advising LEP individuals of free language assistance services. Vital documents will be translated in Spanish, Chinese (Simplified), Vietnamese, Russian, and Arabic. Vital Documents to be translated include:
  - i. "I Speak" Language Cards
  - ii. Immigration Resource Guides
  - iii. Flag Raising Application & Checklist

### 3.) Procedure for Submitting a document for translation:

- a. Email the editable document to Office of Immigrant Affairs – Language Access Program Manager at [Orlando.almonte@phila.gov](mailto:Orlando.almonte@phila.gov)
- b. OIA obtain a quote from translation vendors
- c. Quote must be approved/signed before proceeding
- d. Quote is then emailed back to translation vendors
- e. Translation will be delivered by vendor per the time estimate in the quote

**NOTE:** Before submitting a document for translation, please review your document and ensure the following:

- The content has not already been translated in another document.
- The document is in a format that can be edited (e.g. MS Word, Publisher, InDesign, etc.)
- Terms you do not want translated are highlighted, i.e. the name of your unit, program or street.
- The document is written so it can be understood by readers with lower literacy skills.

### 4.) Signage

- a. Currently, the Office of Immigrant Affairs does not have signage in their office that would require translation.

### 5.) Website Translation

- a. The OIA Website contains information about public meetings and events concerning the city and immigrant communities, as well as information about language access in the city. The information will be translated and available in other languages as it is developed.
- b. In Fiscal Year 2018, the Office of Immigrant Affairs will translate and provide additional selected documents and notices and make them available through the website, social media and/or community engagement meetings and other events. OIA will periodically review the OIA website with the goal of improving its accessibility to LEP persons. This includes identifying the most important information to be translated and the

best means for disseminating translations to LEP communities.

#### 6.) Future Plans

- a. Write public materials in plain English and translate extensively. OIA has a budget for language services which will be used on translations of public materials and vital documents. OIA will implement a process involving community feedback to determine which languages are in higher demand to best accommodate the LEP community.

### C. BILINGUAL STAFF

#### 1) Current Staff

- a. This list identifies the languages spoken by the Office of Immigrant Affairs staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to service as interpreters if available:
  - i. Spanish,
  - ii. Mandarin

#### 2) Future Plans

- a. **Hiring** – Hiring decisions are based on City departments' business needs as interpreted by department heads, including language service needs. Language service needs will be addressed by including language skills as a "desirable" qualification in job and internship announcements.
- b. **Staff Interpreters** – Competent and trained bilingual staff can also function as interpreters for other staff, when needs and staffing permits. OIA currently does not have a formally trained interpreter on staff but has staff that can serve as interpreters in a non-technical, non-legal setting.

### D. TRAINING STAFF ON POLICY, PLAN AND PROTOCOLS

#### 2) Training Protocol

- a. The Office of Immigrant Affairs Language Access Plan is part of new employment training and provided to all staff members at hiring.
- b. All staff will receive language access training upon employment and then refresher courses annually as needed.
- c. Language access training will include information on the following topics:
  - i. Legal obligation to provide language assistance;
  - ii. Language access plan and protocols;
  - iii. Cultural competency;
  - iv. How to use/request current language services

#### 3) Future Plans

- a. The Office of Immigrant Affairs will work to provide bilingual employees with formal interpretation training and expand training opportunities on plain-language and cultural competency topics.

### E. ADMINISTRATIVE HEARINGS

*This section applies to departments that hold administrative hearings. State law (2 C.S. § 561 et seq. (Act 172 of 2006)), requires the appointment of certified or otherwise qualified interpreters for local administrative hearings. In this section list the protocols for language access in administrative hearings.*

Currently, the Office of Immigrant Affairs does not hold administrative hearings.

## **6. NOTICE OF THE RIGHT TO LANGUAGE ACCESS**

- 1) Posters notifying LEP individuals of their right to language services will be developed and displayed in our main office, which is mainly the area of public contact. These posters will contain information regarding free interpretation services and different languages for the individual to indicate which language they need assistance in.
- 2) Department notices and flyers will also provide notice of the availability of language services with simple instructions on how to request language assistance, if applicable.
- 3) Tag lines will be included in or attached to public documents and notices that explain that LEP individuals can obtain a translation of the document or that an interpreter can be made available.
- 4) Staff and LEP individuals will also have access to the City of Philadelphia Language Access Cards. These are cards with a detachable wallet-size card that say in both English and a second language "I speak (language). I need assistance in (language)."
- 5) In all areas of public contact, the Office of Immigrant Affairs will post and maintain clear and readable signs in the languages most prevalent in the City notifying LEP individuals that free translation and interpretation services are available to them.
- 6) Display a "Language Card" or poster where an LEP individual can point to the language that they need help in:

## **7. DATA COLLECTION AND MONITORING**

### **A. Data Collection**

The following information will be required to be monitored and collected by departments and will be collected via quarterly reports by the Office of Immigrant Affairs:

- (1) Number of LEP Encounters (By Language)
- (2) Type of Language Services Provided to LEP Customers
- (3) Number of Documents Translated
- (4) Language Services Expenditures

Additionally, Language Access Coordinators will be required to report quarterly on the following:

- (1) Number of bilingual staff
- (2) Number of staff trained in Language Access/Cultural Competency

The Office of Immigrant Affairs will supply all departments with a Language Access Data Collection sheet to assist in the reporting of this data.

### **B. Annual Report/Evaluation**

- 1) The Office of Immigrant Affairs will conduct an annual evaluation of its Language Access Plan to determine its overall effectiveness, review the progress of department goals and identify new goals or strategies for serving LEP residents. The designated staff will lead the evaluation with the assistance of the Director and Deputy Director. The evaluation will include the following:
  - a. Assessment of the use of telephonic interpretation, in-person interpretation and translation services.
  - b. Assessment of data collected about the LEP's primary language.
  - c. Assessment of the number and types of language requests during the past year.
  - d. Assessment of whether staff members understand the Language Access Plan and procedures, how to carry them out, and whether language assistance resources and arrangements for those resources are up-to-date and accessible.

- e. Assessment of complaint information; and
  - f. Assessment of soliciting feedback from LEP individuals and community groups.
- 2) Evaluation results and recommended changes will be shared by OIA's Language Access Coordinator and incorporated into an **annual report which is required to be filed under Philadelphia Home Rule Charter § 8-600**. The Language Access Coordinator will also keep a record of any language access services provided and will make this information available during the annual review process. For updates to the Language Access Plan, the Office of Immigrant Affairs may use some of the following tools to conduct further assessment:
- a. Request comments and feedback from visitors that have received language services
  - b. Establish a tracking system to collect primary-language data for individuals that participate in programs and activities

## **8. LANGUAGE ACCESS GRIEVANCE PROCEDURE**

You may file a Language Access grievance with the Office of Immigrant Affairs if you believe you have been wrongly denied the benefits of this Language Access Plan. You must file your complaint within 6 months of the alleged denial. To file a formal complaint, please contact:

Orlando Almonte  
 Language Access Program Manager  
 City of Philadelphia Office of Immigrant Affairs  
 1401 John F. Kennedy Blvd., 14th Floor, Suite 1430, Philadelphia, PA  
 Direct: (215) 686-2170  
[Orlando.Almonte@phila.gov](mailto:Orlando.Almonte@phila.gov)

Additionally, any person, regardless of immigration status, may submit a formal legal complaint through the Philadelphia Commission on Human Relations. To do so, please call or email:

Philadelphia Commission on Human Relations  
 The Curtis Center  
 601 Walnut Street., Suite 300 South  
 Philadelphia, PA 19106  
 215-686-4670 or email [pchr@phila.gov](mailto:pchr@phila.gov)

For more information on PCHR, please visit [www.phila.gov/humanrelations](http://www.phila.gov/humanrelations)

## **9. TIMELINE FOR IMPLEMENTATION**

2017

- Implement language access protocol, utilizing telephonic and in-person interpretation as needed
- Have all current vital documents translated and publicly available
- Assess if other documents should be translated
- Have all employees trained in Language Access
- Provide public notice of available language services through use of posters and flyers available in our main office
- Review any Language Access comments or complaints and determine possible changes

2018

- Review Language Access Report and assess data and use to make further changes to the Language Access Plan
- Agency will adjust and update this plan as needed

## **10. SIGNATURE PAGE**



Language Access Coordinator

**Orlando Almonte**

**City of Philadelphia Office of Immigrant Affairs**



Director

**Miriam Enriquez, Esq.**

**City of Philadelphia Office of Immigrant Affairs**